

From: John Mills
Sent: Friday, January 16, 2004 2:16 PM
To: Sumi, David
Cc: Alan Gribnau; Alex Hildebrand; Anisa Divine; BJ Miller; Nick DiCroce; 'Linda Cole'; 'Merita Calloway'; 'Steve Shaffer'; Arnold Whitridge; Carolyn Yale; cuwaexec; Guivetchi, Kamyar; Michael Warburton; Sarah Goldberg
Subject: Chapter 6 comments...

David:

I only have a few comments in addition to those which were worked over pretty well on the conference call of this past week. If I could get you to follow along with this here are my areas of concern:

1. Table 6.2: The Conjunctive Management section on Local Initiatives should include local government. Many Conj. use projects will require clearance from a local county groundwater ordinance to operate. This would make them (at least) a responsible agency under CEQA and in many cases the lead agency. Please add them in.
2. Table 6.2. Ditto on recharge protection areas. Counties (and cities) have land use planning regulatory authority in addition to well siting and well protection zoning measures.
3. Table 6.2. Under Catastrophic contingency plans, it should be noted that under State Planning law cities and counties must prepare Safety Elements to their General Plans to deal with catastrophic matters of all sorts. Additionally, most local offices of Emergency Services are nested in the County. Please add them here.
4. Table 6.2. Under watershed management please add local government under both local programs as well as the SWRCB Watershed program. Counties have been applicants and partners in numerous watershed efforts throughout the state. Additionally, to carry out many watershed restoration efforts, permits from local cities and counties are necessary to comply with local plans and ordinances as well as CEQA (some watershed efforts can get fairly disruptive!). Please add local government.
5. Table 6.2. Ditto on page 6 for expanded groundwater storage and system wide reoperation. Counties often must be willing partners, or at least issue a discretionary permit for the former and flood control and land use are a factor in the latter.
6. Table 6.3. Under Conjunctive Management and Ground Water Storage please add "Potential conflicts between local management objectives and state wide or regional objectives"
7. Table 6.3. Under Ecosystem Restoration please add "Maintenance or improvement of Water Quality". Recent data supports the early concerns in the CalFed EIS/EIR that ecosystem restoration of wetlands could result in mercury pollution problems as well as significantly increase T.O.C. loads to streams.
8. Table 6.3. Recharge Area Protection. Please insert the words policies and objectives between government and and.

9. Table 6.3. System Reoperation. Please add flood control conflicts to this section. Some reoperation schemes advanced have proposed to remove flood control responsibility from existing dams as a way to garner additional firm yield. This has downstream flooding consequences.

10. Table 6.3. Water Transfers. Please add Area of Origin to the list. Long term transfers "lock up" water which may be necessary in the future for Area of Origin use.

11. Table 6.3. Please add funding. Watershed funding is far short of what is necessary to carry out large landscape level activities.

Thanks for your anticipated attention to these points. Call me if you have any questions.

John